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March 13, 2012

BY ECF

Nicole Argentieri Rachel Nash Allon Lifshitz Assistant United States Attorneys Eastern District of New York 271 Cadman Plaza East Brooklyn, New York 11201

Re: United States v. Persico, et al., S-4 10 Cr. 147 (SLT)

Dear Government Counsel:

On behalf of Michael Persico, Theodore Persico Jr. and Francis Guerra, we ask that the government immediately produce, pursuant to Rule 16(a)(1)(E)(i), the following materials to the defense:

- (1) We renew our request for any and all documents within the government's possession, custody or control relating to the death of Joseph Scopo, including the New York City Police Department's homicide file; and
- (2) All and all prison records for Joseph Monteleone Sr. (Reg. No. 16230-053), Anthony ("Chucky") Russo (Reg. No. 42252-053) and Joseph Russo (Reg. No. 19793-054) from January 1990 through December 1994.

If you do not intend to produce these materials, please let us know immediately in order that we may seek the appropriate relief from the Court.

Very truly yours, /s/ Sarita Kedia

Paul Shechtman